

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ORANGEBURG DIVISION

Andrew McLaughlin,

Plaintiff,

V.

Carlton Reginald Lee and The Mahoney
Group, Inc.,

Defendants.

5:25-cv-7045-SAL

CASE NO.: ~~25-cv-99999~~

(Formerly Case No. 2025-CP-38-00815)

NOTICE OF REMOVAL

TO: THE UNITED STATES DISTRICT COURT

The Defendants would respectfully show unto the Court in support of its Notice of Removal that:

1. The Summons and Complaint in this action were filed on June 13, 2025 in the Court of Common Pleas for Orangeburg County, South Carolina. Attached for the Court are copies of the Plaintiff's Summons and Complaint. The Complaint is the first pleading served upon the Defendants in this action, and service was affected on Defendant The Mahoney Group, Inc. on June 23, 2025. Therefore, removal is timely under 28 U.S.C. §1446(b).

2. The United States District Court has jurisdiction over this action pursuant to 28 U.S.C. §1332. The Plaintiff is a resident of the State of Virginia. Defendant Carlton Reginald Lee is a resident of the State of South Carolina. Defendant The Mahoney Group, Inc. is a resident of the State of North Carolina. This action has been brought by the Plaintiff against the Defendants for an accident alleged to have occurred in Dillon County, South Carolina.

3. Venue is proper in the Florence Division of this Court pursuant to 28 U.S.C. §1441(a) and Local Rule 3.01 (D.S.C.).

4. The Plaintiff has made an unlimited prayer for relief in the Complaint. He is seeking an award of compensatory, consequential, and punitive damages against the Defendants, as well as past and future medical expenses, emotional distress and anxiety, physical pain and suffering, mental anguish, loss of enjoyment of life to the detriment of the Plaintiff's physical health and wellbeing, personal property damage. The Plaintiff is also seeking costs, attorney's fees, and pre and post judgment interest.

5. The Defendants have filed no pleadings in this action with the Court of Common Pleas of Orangeburg County, South Carolina, in response to the Plaintiff's Complaint. The Defendants' Answer to the Plaintiff's Complaint is being filed shortly after this Notice of Removal in the Federal Court.

6. The Defendant will furnish a copy of this Notice to the Clerk of Court for Orangeburg County, South Carolina after it is filed with the Federal Court.

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